
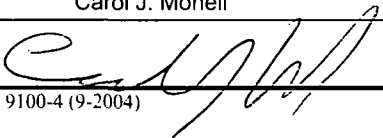


Superfund Property Reuse Evaluation Checklist for Reporting the Sitewide Ready for Anticipated Use GPRA Measure

Note: Upon issuance of the Guidance for Documenting and Reporting Performance in Achieving Land Revitalization (March 1, 2007), the Sitewide Ready-for-Reuse measure was renamed "Sitewide Ready for Anticipated Use" (Sitewide RAU).

	United States ENVIRONMENTAL PROTECTION AGENCY Washington, DC 20460
SUPERFUND PROPERTY REUSE EVALUATION CHECKLIST FOR REPORTING THE SITEWIDE READY FOR ANTICIPATED USE GPRA MEASURE Office of Superfund Remediation & Technology Innovation and Federal Facilities Restoration & Reuse Office	
PART A – GENERAL SITE INFORMATION	
1. Site Name Cedartown Municipal Landfill	2. EPA ID GAD980495402
3. Site ID 0401660	4. RPM Brian Farrier
5. Street Address West of North Tenth Street and Girard Avenue	
6. City Cedartown	7. State Georgia
8. Zip Code 30125	
9. Site Wide Ready for Anticipated Use Determination Requirements (all must be met for the entire construction complete site)	
<input checked="" type="checkbox"/> All cleanup goals in the Record(s) of Decision or other remedy decision document(s) have been achieved for any media that may affect current and reasonably anticipated future land uses, so that there are no unacceptable risks.	
<input checked="" type="checkbox"/> All institutional or other controls required in the Record(s) of Decision or other remedy decision document(s) have been put in place.	
PART B – SIGNATURE (Branch Chief or above should sign)	
NOTE: The outcome of this Property Reuse Evaluation does not have any legally binding effect and does not expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits of any party. EPA assumes no responsibility for reuse activities and/or any potential harm that might result from reuse activities. EPA retains any and all rights and authorities it has, including but not limited to legal, equitable, or administrative rights. EPA specifically retains any and all rights and authorities it has to conduct, direct, oversee, and/or require environmental response actions in connection with the site, including but not limited to instances when new or additional information has been discovered regarding the contamination or conditions at the site that indicates that the response and/or the conditions at the site are no longer protective of human health or the environment.	
10. Name Carol J. Monell	11. Title/Organization Chief, Superfund Remedial Branch
12. Signature 	13. Date 1/27/11

EPA Form 9100-4 (9-2004)



ROUTING AND TRANSMITTAL SLIP

TO:	Initials	Date
1. William Denman, SRB	WD	9/1/10
2. Brian Farrier, SRB	BF	9/2/10
3. David Keefer, SRB	DK	12/6/10
4. Matthew Hicks, OEA	DH for mt	9/28/10
5. Yvonne Jones, SRSEB (ICTS Coord.)	YJ	1/26/11
6. William Denman, SRB	WD	1/27/11
7. Carol Monell, SRB	CM	1/27/11
8.		

ACTION REQUESTED: Signature of the Sitewide Ready for Anticipated Use (RAU) Checklist for the Cedartown Municipal Landfill Site in Cedartown, GA

- The 1993 ROD required “institutional controls, such as record notices and deed, zoning and land-use restrictions” as part of the selected remedy. The ROD stated that institutional controls be implemented as follows to minimize land use:
 - Deed or Record Notices would be placed on the landfill property and those properties affected by contaminated ground water;
 - Municipal ordinances concerning permitting the installation of wells would be applied to prevent ground water well installation on the Site and/or affected properties, and;
 - The Municipalities (City of Cedartown and/or Polk County) would annex all site properties and implement zoning restrictions that prevent development that would disturb or adversely change existing Site conditions of the Site and prevent ground water use of properties affected by the Site. If these mechanisms (well permitting, annexation, and/or zoning mechanisms) fail to restrict usage, cannot be implemented, and/or ordinances and municipal regulations are changed and are no longer restrictive, deed restrictions or restrictive covenants would be implemented.
- A ROD amendment in 1998 revised the ICs to “institutional controls to restrict groundwater use beneath and immediately surrounding the Cedartown Site. The selected cleanup alternative involved implementation of institutional controls to restrict ground-water use in the areas where performance standards were exceeded along with maintenance of the landfill cover.

- In 1996, property was annexed to the City of Cedartown and a special-use zoning ordinance for the site was passed to restrict use of the site (copy attached). Under this ordinance, the property was zoned as a special use district with the following terms of use.
 - The planting of permanent vegetation, ground cover, timber or any other vegetation to prevent erosion, sedimentation or to prevent soil disturbance in the designated district shall be permitted.
 - The property in this classification has previously been declared to potentially be a threat to human health and the environment; or could be potentially such a threat, based upon either federal regulations, state procedures and/or local decisions of the zoning and planning commission of the City of Cedartown. As such, no improvements which would allow human occupation of the property, no ground water collection facilities, ponds, lakes; nor any wells (drinking water, commercial use wells, raw water or any other type wells)' shall be permitted in this district.
- The institutional controls required by the ROD have been implemented and are effective. The Cedartown Municipal Landfill Site meets SWRAU criteria.

FROM: William Denman, RPM/SWRAU Coordinator
Superfund Remedial Branch, ext. 28939

CEDARTOWN, GEORGIA

CERTIFICATION OF ORDINANCE

CITY OF CEDARTOWN

I, EMILY C. SHAW, AS CITY CLERK AND CUSTODIAN OF RECORDS FOR THE CITY OF CEDARTOWN, HEREBY CERTIFY THAT THE ATTACHED ORDINANCE IS A TRUE AND CORRECT COPY OF ORDINANCE NO. 14, 1996, ZONING. AS CONTAINED ON FILE IN THE CITY CLERKS OFFICE OF THE CITY OF CEDARTOWN.

THIS THE 6th DAY OF DECEMBER, 1996.

SIGNED: Emily C. Shaw
CITY CLERK

ORDINANCE NO. 14, 1996

**AN ORDINANCE BY THE CITY COMMISSION
OF THE CITY OF CEDARTOWN, GEORGIA**

WHEREAS, there is a need to change the districts within the zoning code of the City of Cedartown, as contained in appendix "B" entitled "zoning", As to article four (IV) thereof; and

WHEREAS, recently the City of Cedartown has determined it necessary to acquire certain property to be annexed to the City of Cedartown, which said property was formerly used for the disposal of municipal solid waste in the city and was the former site of the "Cedartown Landfill"; and

WHEREAS, the Commission desires to restrict the zoning within the uses of this property, and must therefore create another zoning classification within the city concerning this special use; and

WHEREAS, in the future there may be certain additional special use zoning classifications for the uses hereinafter defined or similar problems which may result in amendments of the zoning ordinance of the City of Cedartown in such special circumstances; and

WHEREAS, there is a need by this ordinance to adopt certain provisions to authorize these changes in this ordinance;

Now, Therefore, be it ordained by the City Commission of the City of Cedartown, and is hereby ordained and established by said authority as follows:

Section 11

This ordinance shall be first read and reviewed by the Commission at its September, 1996 meeting. A public notice concerning these proposed changes in the zoning code of the City of Cedartown shall, after the ordinance has been reviewed, be published in the Cedartown Standard. Said notice is attached here to exhibit "A" and made apart hereof by reference. Public comments shall be obtained before final approval of these amendments, at a public hearing to be called and held at the regular October meeting of the City Commission of the City of Cedartown, to be held on Monday, October 14, 1996 at seven o'clock in the evening.

Section 2:

The Code of the City of Cedartown as contained in appendix "B" thereof, in article four shall stand amended by adding to section 4.1 thereof entitled "Division into Districts" the following two new additional districts or designations to be defined as follows:

"SU-1 special use (restricted) district

SU-2 (Special Use Classification)"

Section 3:

The Code of the City of Cedartown shall stand further amended as to Appendix "B" article seven (VII) entitled "Use Requirements by District", by adding thereto a new section to be designated as section 7.10. Said section shall read as follows:

"Sec. 7.10. Special Use (Restricted) district"

Within a special use (Restricted) district, the following uses shall be permitted:

7.10.1. The planting of permanent vegetation, ground cover, timber or any other vegetation to prevent erosion, sedimentation or to prevent soil disturbance in the designated district.

7.10.2. The property in this classification has previously been declared to potentially be a threat to human health and the environment; or could be potentially such a threat, based upon either federal regulations, state procedures and/or local decisions of the zoning and planning commission of the City of Cedartown. As such, no improvements which would allow human occupation of the property, no ground water collection facilities, ponds, lakes; nor any wells (drinking water, commercial use wells, raw water or any other type wells) shall be permitted in this district.

Section 4:

The Code of the City of Cedartown shall stand further amended by creating a new article eight (VIII) to Appendix "B"-

zoning which shall be entitled "Article VIII-Special Use Classification District". This new article shall read as follows:

ARTICLE VIII (8). SPECIAL USE DISTRICT

- a) A "Special Use District" shall be defined as a district which creates , adjacent to abutting Residential, Commercial, or Industrial zones, a certain new classification of property based upon a "Special Use" of said property, or special stipulations concerning the use of the property; since the property because of its unique character, location or use does not fit within the general use requirements by districts, as contained in article VII hereof. This use classification is based upon either special conditions for the use of the property, certain restrictions that will be applied to the use, or other similar circumstances so that the property thereafter will be designated with the Special Use. As an example, An "R-1" use could have a further classification of "SU" Appended to it in that the residential single family dwellings to be built upon the property shall be based upon lots with either additional set back requirements as those contained in the subdivisions regulations, square footage use restriction, or other similar restrictions that may be placed by the developer of the property; or Special Uses placed upon the property by the the city in connection with any review and approval of zoning of the property.
- b) The use to be permitted by this designation either as a special district under this article, or as a designation within any other Residential, Commercial or Industrial District, shall consider the following uses and matters affecting the property:
 - 1) The use and zoning of surrounding property;
 - 2) The need for a special buffer, special circumstances with regard to the zoning

classification, for other special use requirement of the property based upon location, terrain, size, topography or similar criteria;

- 3) The overall zoning development plan of the City of Cedartown as it relates to the geographical district within one square mile radius of the location of the property;
- 4) Environmental conditions, uses, concerns for similar requirements;
- 5) The submitted development plan, or proposed building plan of the property.
- 6) Other criteria as may be established by the planning commission or building inspector of the City of Cedartown in a review of any requested zoning.

Section 5:

All laws or parts of laws in conflict herewith are specifically repealed. In the event any portion of this ordinance should be declared unconstitutional or otherwise unenforceful, all remaining portions thereof shall continue in full force and effect.

ADOPTED AND APPROVED by the City Commission of the City of Cedartown on the 14th day of October, 1996, at a regular meeting thereof, duly called and held, all Commissioners voting "Aye", none voting "No".

APPROVED:

By: Bert Wood

CHAIRMAN, CEDARTOWN CITY
COMMISSION

ATTEST:

[Signature]
SECRETARY, CEDARTOWN CITY
COMMISSION

EXHIBIT "A"

NOTICE OF ZONING AMENDMENT-CITY OF CEDARTOWN

Notice is hereby given that an ordinance has been introduced at the September, 1996 meeting of the Cedartown City Commission which, if adopted would make some changes in the zoning code of the city. The first change would be to create a special restricted use classification for property, so that property which may be environmentally hazardous, subject to environmental investigations, or otherwise in need of special restrictions could be so classified pursuant to the zoning ordinances of Cedartown.

The Ordinance also would create a "Special Use Classification" which could be added to the existing zoning restrictions of the City of Cedartown, or create a Special Use District for property based upon the property's unique topography, uses to be made of the property, the need for zoning buffers, or similar matters.

The effect of this ordinance is to create two new zoning classifications which will be used in the future in making decisions concerning zoning within the City of Cedartown. A copy of the proposed ordinance amendments is on file in the office of the Clerk at City Hall. The document is available for public inspection during normal business hours.

A Public Hearing, concerning this proposed zoning ordinance amendment shall be conducted at the October regular meeting of the City Commission of the City of Cedartown, to be held on October 14, 1996 at seven o'clock (7:00) in the evening.

This 9th day of September, 1996.

Emily C. Shaw
Emily C. Shaw, City Clerk
City of Cedartown

9/18/96

SPD
EXHIBIT "A"
NOTICE OF
ZONING AMENDMENT
CITY OF CEDARTOWN

Notice is hereby given that an ordinance has been introduced at the September, 1996 meeting of the Cedar-town City Commission which, if adopted would make some changes in the zoning code of the city. The first change would be to create a special restricted use classification for property, so that property which may be environmentally hazardous, subject to environmental investigations, or otherwise in need of special restrictions could be so classified pursuant to the zoning ordinances of Cedar-town.

The Ordinance also would create a "Special Use Classification" which could be added to the existing zoning restrictions of the City of Cedar-town, or create a Special Use District for property based upon the property's unique topography, use to be made of the property, the need for zoning authority, or similar matters.

The effect of this ordinance is to create two new zoning classifications which will be used in the future in making decisions concerning zoning within the City of Cedar-town. A copy of the proposed ordinance amendments is on file in the office of the Clerk of City Hall. The document is available for public inspection during normal business hours.

A Public Hearing, concerning this proposed zoning ordinance amendment will be conducted at the October regular meeting of the City Commission of the City of Cedar-town.

There, to be held on October 14, 1996 at seven o'clock (7:00) in the evening.

Tell: 1st Day of September, 1996.
Ernie C. Shaw, City Clerk

City of Cedar-town
September 10, 21, 1996

Attachment G
Public Notice



**AMENDED RECORD OF DECISION
SUMMARY OF REMEDIAL ALTERNATIVE SELECTION**

**CEDARTOWN MUNICIPAL LANDFILL SITE
CEDARTOWN, POLK COUNTY, GEORGIA**

**PREPARED BY
U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
ATLANTA, GEORGIA**

DECLARATION
of the
AMENDED RECORD OF DECISION

SITE NAME AND LOCATION

Cedartown Municipal Landfill Site,
Cedartown, Polk County, Georgia

STATEMENT OF BASIS AND PURPOSE

This decision document (Amended Record of Decision) presents an amendment to the selected remedial action for the Cedartown Municipal Landfill Site, Polk County, Georgia, developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended, 42 U.S.C. Section 9601 et seq., and in accordance with, the National Contingency Plan (NCP) 40 CFR Part 300.

The original selected remedy was signed in November 1993. Based on new information obtained during the Remedial Action, it was determined that the remedy should be amended. This ROD Amendment provides for necessary changes to the remedy based on information obtained during the groundwater monitoring mandated by the November 1993 ROD. This ROD amendment is consistent with the Superfund Administrative Reforms Guidance.

This amended decision is based on the administrative record for the Cedartown Municipal Landfill Site. In addition, this ROD amendment will become a part of the Administrative Record for the site. The Administrative Record for this site can be found at the Information Repository located at the United States Environmental Protection Agency, 61 Forsyth Street, Atlanta, Georgia 30303 or the Cedartown Public Library, 245 East Avenue, Cedartown, Georgia.

The State of Georgia has concurred on this amendment to the selected remedy (Appendix A).

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this ROD amendment, may present an imminent and substantial endangerment to public health, welfare or the environment.

DESCRIPTION OF SELECTED REMEDY

This document is an amendment to the remedial action described in the Record of Decision (ROD) dated November 2, 1993 for the Site. The function of the remedy, as described in the ROD as amended, is to restrict access to contamination and to reduce contamination to health based levels which are protective of human health and the environment. Contaminated groundwater is the principal threat at the site.

The major components of the amended groundwater remedy are:

- Institutional controls to restrict groundwater use beneath and immediately surrounding the Site, and
- Maintenance of the landfill cover and seep controls.

The requirement for groundwater monitoring and the pump-and-treat contingency have been removed from the remedy.

STATUTORY DETERMINATIONS

The selected remedy, as amended, is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate, and is cost-effective. This remedy utilizes permanent solutions and alternative treatment technology to the maximum extent practicable, and considered the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element.

Because this remedy may result in hazardous substances remaining on-site, a review will be conducted within five years after commencement of the remedy to ensure that the remedy continues to provide adequate protection of human health and the environment. This review will include a groundwater sampling event to verify that the selected remedy remains protective.



Richard D. Green
Director,
Waste Management Division

11 MAY 98

Date

\$8,631,000. The cost for Alternative 3 is minimal, since it involves only periodic maintenance of the cover and implementation of institutional controls. The estimated cost is \$5,000.

Modifying Criteria

6.8 State Acceptance

The State of Georgia has concurred on this amendment to the selected remedy (Appendix A).

6.9 Community Acceptance

EPA has selected institutional controls and landfill cover maintenance as the remedy for the Site. EPA received only one comment on the proposed plan which supported selection of Alternative 3 - Institutional and Engineering Controls.

7.0 Selected Remedy

Based upon the Administrative Record, consideration of the requirements of CERCLA, the NCP, the detailed analysis of alternatives and public and state comments, EPA has selected an amended remedy for this site. The selected cleanup alternative to reduce to levels protective of human health and the environment risks posed by contamination found at the Cedartown Site is Alternative 3 - Institutional and Engineering Controls. This remedy involves implementation of institutional controls to restrict groundwater use in the areas where performance standards are exceeded. Groundwater monitoring would not be continued, since existing data has demonstrated that contamination is not migrating away from the site. EPA would conduct a five-year review to determine if the remedy remained protective of human health and the environment. The estimated cost of this remedy is \$5,000.

This remedy will protect human health and the environment by restricting groundwater use in areas where performance standards are exceeded. ARARs can be easily met. Although this remedy will not reduce toxicity and volume through treatment, mobility appears to be reduced, as indicated by groundwater monitoring results. The selected remedy is easily implemented and is cost effective.

Performance Standards

The selected remedy will achieve the performance standards specified in the original ROD, with the exception of the area beneath and immediately surrounding the landfill. All activities shall comply with ARARs, and state standards.



10018940



RECORD OF DECISION
SUMMARY OF REMEDIAL ALTERNATIVE SELECTION

CEDARTOWN MUNICIPAL LANDFILL SITE
CEDARTOWN, POLK COUNTY, GEORGIA

PREPARED BY
U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
ATLANTA, GEORGIA

DECLARATION
of the
RECORD OF DECISION

SITE NAME AND LOCATION

Cedartown Municipal Landfill Site
Cedartown, Polk County, Georgia

STATEMENT OF BASIS AND PURPOSE

This decision document (Record of Decision), presents the selected remedy for the Cedartown Municipal Landfill Site, Cedartown, Georgia, developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), 42 U.S.C. § 9601 et seq., and to the extent practicable, the National Contingency Plan (NCP), 40 CFR Part 300.

This decision is based on the administrative record for the Cedartown Municipal Landfill Site.

The State of Georgia concurs with the selected remedy.

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from the Cedartown Municipal Landfill Site, if not addressed by implementing the response action selected in this Record of Decision (ROD), may present an imminent and substantial endangerment to public health, welfare, or the environment.

DESCRIPTION OF THE SELECTED REMEDY

This action is the first and final action planned for the Site. This alternative calls for the design and implementation of response measures which will protect human health and the environment. The action addresses the principal threat at the Site, the contaminant sources in the wastes, as well as the ground water contamination at the Site.

The major components of the selected remedy include:

- cover maintenance and seep controls;
- institutional controls, such as record notices and deed, zoning and land-use restrictions;
- ground/surface water monitoring program to insure natural attenuation processes would be effective and that contaminants would not migrate;

- a two year review during which EPA would determine whether ground water performance standards continue to be appropriate and if natural attenuation processes are effective. EPA shall consider and at EPA's sole discretion implement an active ground water remediation if ground water performance standards continue to be appropriate and natural attenuation processes are not effective,
- a contingency remedial action which includes ground water extraction, on-site treatment, and discharge under National Pollutant Discharge Elimination System (NPDES) to a nearby surface water or POTW; and,
- continued ground water monitoring upon attainment of the performance standards at sampling intervals to be approved by EPA. The ground water monitoring program would continue until EPA approves a five-year review concluding that the alternative has achieved continued attainment of the performance standards and remains protective of human health and the environment.

STATUTORY DETERMINATIONS

The selected remedy with an active ground water treatment contingency is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate, and is cost-effective. This remedy with contingency satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element. Finally, it is determined that this remedy utilizes a permanent solution and treatment technology to the maximum extent practicable.

Because this remedy may result in hazardous substances remaining on-site, a review will be conducted within five years after commencement of the remedy to ensure that the remedy continue to provide adequate protection of human health and the environment.

Patrick M. Tobin

PATRICK M. TOBIN, ACTING REGIONAL ADMINISTRATOR

11-2-93

DATE

selected alternative will reduce the mobility, toxicity, and volume of contaminated ground water at the Site. In addition, the selected alternative is protective of human health and the environment, will attain all Federal and State applicable or relevant and appropriate requirements, is cost-effective and utilizes permanent solutions to the maximum extent practicable.

Based on the information available at this time, the selected alternative represents the best balance among the criteria used to evaluate remedies. Alternative No. 2 is believed to be protective of human health and the environment, will attain ARARs, will be cost effective, and will utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable.

A. SOURCE CONTROL

Since the Baseline Risk Assessment indicates no unacceptable risk to exposure to soils, source control remediation will address restricting exposure to contaminated wastes and subsurface soils at the Site, prevent potential migration of landfill leachate to surface waters, and ensure cover integrity to minimize ground water contamination. Source control shall include landfill cover maintenance, seep controls, and land use restrictions.

A.1. The major components of source control to be implemented include:

- Cover maintenance and seep controls;
- Institutional controls implemented as follows to minimize land use:
 - 1) Deed or Record Notices would be placed on the landfill property and those properties affected by contaminated ground water;
 - 2) Municipal ordinances concerning permitting the installation of wells would be applied to prevent ground water well installation on the Site and/or affected properties, and;
 - 3) The Municipalities (City of Cedartown and/or Polk County) would annex all site properties and implement zoning restrictions that prevent development that would disturb or adversely change existing Site conditions of the Site and prevent ground water use of properties affected by the Site.

**TABLE 8-1
COMPARISON OF COSTS**

Alternative	30 Year Present-worth Cost	Capital Cost	Monitoring and Maintenance Cost (30-yr)
1. No-Action	\$ 0	NONE	\$ 0
2. Institutional Controls, Cover & Seep Maintenance, and Ground water Monitoring	\$ 625,000	\$10,000	\$ 615,000
3. Ground water Treatment	² \$ 5,225,000 – ³ 8,631,000	\$ 1,394,350 – 1,539,450	\$ 5,225,000 – 7,091,500
¹ If the ground water contingency remedy is implemented, the estimated total cost of \$4,923,700 as indicated in alternative 3 would apply.			
² Based on a 50 gallon per minute (gpm) treatment system			
³ Based on a 100 gallon per minute (gpm) treatment system			

8.3.2 COMMUNITY ACCEPTANCE

Based on comments expressed at the September 9, 1993, public meeting and receipt of written comments during the comment period, it appears that the Cedartown community generally agrees with the selected remedy; however, various comments received during the meeting and comment period did indicate a preference for Alternative 1, No-Action. Specific responses to issues raised by the community can be found in Appendix A, The Responsiveness Summary.

9.0 SUMMARY OF SELECTED REMEDY

Based upon consideration of the requirements of CERCLA, the NCP, the detailed analysis of alternatives and public and state comments, EPA has selected Alternative 2, institutional controls, ground water monitoring, and a ground water treatment contingent remedial action for this Site. At the completion of this remedy, the risk associated with this Site will be protective of human health and the environment.

The selected alternative for the Cedartown Municipal Landfill Site is consistent with the requirements of Section 121 of CERCLA and the National Contingency Plan. The

If these mechanisms (well permitting, annexation, and/or zoning mechanisms) fail to restrict usage, cannot be implemented, and/or ordinances and municipal regulations are changed and are no longer restrictive, deed restrictions or restrictive covenants would be implemented.

- Coke Pond surface water samples will be collected at sampling intervals to be approved by EPA to ensure leachate contaminants do not migrate from the East Seep. EPA will re-evaluate whether the potential migration from Landfill seep(s) to the Coke Pond still exists during the Five-Year Review. EPA may at its sole discretion discontinue sampling. Surface water sampling results shall be compared to the appropriate Federal Ambient Water Quality Criteria or more stringent Georgia Surface Water Quality Standard for aluminum, chromium, copper, lead, nickel, and zinc to ensure the contaminants do not migrate from the East Seep to the Coke Pond.

B. GROUND WATER MONITORING/RESTORATION

Ground water monitoring will be implemented at this Site to assess the movement of contamination through ground water. If ground water contaminants of concern do not meet monitoring performance standards, a contingency pump and treat system described in Alternative #3 shall be considered and at EPA's sole determination be implemented.

B.1. The major components of ground water monitoring/restoration to be implemented include:

- Long-term monitoring of ground water to consist of the following:
 - 1 Ground water monitoring program to insure that natural attenuation works and contaminants do not move.
 - 2 Two-year review during which EPA would determine whether ground water performance standards continue to be appropriate and would determine the effectiveness of natural attenuation.
 - 3 The ground water monitoring program would require further sampling and analysis to further define background ground water concentrations of inorganic contaminants and the effectiveness of natural attenuation. This remedy could require the installation of additional well(s). If, based on that information, the background concentration for an inorganic exceeded the MCL or acceptable